

1 DANIEL G. BOGDEN
United States Attorney
2 ERIC JOHNSON
Chief, Organized Crime Strike Force
3 KATHLEEN BLISS
Assistant United States Attorney
4 Organized Crime Strike Force
333 Las Vegas Boulevard South, Room
5 Las Vegas, Nevada 89101
Telephone: (702)388-6336
6 Facsimile: (702)388-6418

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 -oOo-

10 UNITED STATES OF AMERICA,)

11 Plaintiff,)

12 vs.)

13 ROBERT MITTLEMAN,)

14 Defendant.)
15)
16)
17)
18)

CRIMINAL INFORMATION

CR-S-04-0150-RCJ-RJJ

VIOLATIONS: 18 U.S.C. § 224(a):
Sports Bribery; 18 U.S.C. § 201(b)(1)(A):
Bribery of a Public Official

19 **THE UNITED STATES ATTORNEY CHARGES THAT:**

20 **COUNT ONE**
21 **(Sports Bribery)**

22 On or about March 31, 2000, in South Carolina and elsewhere, the
23 Defendant, Robert Mittleman, willfully carried into effect and attempted to carry into effect
24 a scheme in commerce to influence, in any way, by bribery any sporting contest, that is, a
25 boxing match in Denmark between Thomas Williams and Bryan Nielson, with knowledge
26 that the purpose of such scheme was to influence by bribery that contest.

In violation of Title 18 United States Code, Section § 224(a).

1

1 **COUNT TWO**
2 (Sports Bribery)

3 On or about August 12, 2000, in the State and District of Nevada and
4 elsewhere, the Defendant, Robert Mittleman, willfully carried into effect and attempted to
5 carry into effect a scheme in commerce to influence, in any way, by bribery any sporting
6 contest, that is, a boxing match in Las Vegas, Nevada, between Thomas Williams and
7 Richie Melito, Jr., with knowledge that the purpose of such scheme was to influence by
8 bribery that contest.

9 In violation of Title 18 United States Code, Section § 224(a).

10 **COUNT THREE**
11 (Bribery of a Public Official)

12 Between on or about February and December 2003, in the State of Nevada
13 and elsewhere, the Defendant, Robert Mittleman, knowingly did indirectly, corruptly give,
14 offer and promise anything of value to a public official with the intent to influence an
15 official act, to wit: Defendant Mittleman did offer \$15,000 and did pay \$3,000 to a person
16 whom Mittleman believed could cause a federal prosecutor and a federal judge to dismiss
17 a case pending in the United States District Court for the District of Nevada, specifically,
18 United States v. Williams, CR-S-01-301.

19 In violation of Title 18 United States Code, Section § 201(b)(1)(A).

20 **DATED:** this 15th of April 2004.

21 DANIEL G. BOGDEN
22 United States Attorney

23 ERIC JOHNSON
24 Chief, Organized Crime Strike Force

25 KATHLEEN BLISS
26 Assistant United States Attorney
Organized Crime Strike Force